

Exhibit C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,)
)
Plaintiff/Counter-Defendant) Civil Action No. 3:22-cv-00208-CWR-RPM
)
v.)
)
HONORSOCIETY.ORG, INC.,)
)
Defendant/Counter-Plaintiff)
/Third-Party-Plaintiff)
)
HONOR SOCIETY FOUNDATION, INC.,)
)
Defendant)
)
-----)
)
HONORSOCIETY.ORG, INC.,)
)
Defendant/Counter-Plaintiff)
/Third-Party-Plaintiff)
)
v.)
)
DR. LYNN TINCER-LADNER,)
)
Third-Party Defendant)

SUPPLEMENTAL DECLARATION OF W. MICHAEL ETIENNE

I, W. Michael Etienne, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am counsel of record for Phi Theta Kappa Honor Society (“PTK”), and Dr. Lynn Tincher-Ladner in this action.
2. On December 5, 2024, PTK was notified that Honor Society continues to distribute a survey titled “Community College Honor Societies Survey,” which has the same title as the

survey Honor Society distributed to hundreds-of-thousands of PTK members and potential members in March of 2024. Although, I understand that a change has been made to the survey so that, at its conclusion, it directs recipients to many of the very same webpages subject of the Court's Second Preliminary Injunction Order and PTK's Motion for Contempt and Sanctions. It appears that Honor Society is attempting to maximize the number of PTK's members and potential members that are exposed to its disparaging, misleading, and contemptuous webpages regarding PTK, Dr. Tincher-Ladner, and this lawsuit while PTK's motion seeking sanctions and a finding of contempt are pending before this Court.

3. A PTK member who received the survey reached out to her PTK chapter advisor stating, "I am a member of PTK and I got an email from 'honorssocietyurvey@gmail.com' and was asked to complete a survey about honor society. The survey was normal, but when I finished and went to submit it, I was redirected to a google search page about 'Phi Theta Kappa Lawsuit' I just wanted to reach out and make you aware that this survey is contacting members and redirecting them to this." Exhibit C-1 is a true and correct copy of the email sent by the student to the chapter advisor, which was forwarded to PTK, all on December 5, 2024. Exhibit C-1 shows that the student took the survey on November 29, 2024.

4. Exhibit C-2 is a true and correct copy of the Google search page that appears when "Phi Theta Kappa Lawsuit" is searched in Google, as accessed on December 6, 2024. From Exhibit C-1, I understand this is the Google search page to which survey recipients are being redirected when they finish the survey.

5. Exhibit C-3 is a true and correct copy of one of the seven Honor Society webpages that appears on the "Phi Theta Kappa Lawsuit" Google search page referenced as Exhibit C-2. This webpage is nearly identical to the Exhibit A-7 of the Etienne Declaration (Ex. 242-1) filed in

connection with PTK's Motion for Contempt and Sanctions. While the font size of the disclaimer has been slightly increased, the disclaimer does not appear at the top of the webpage, which is a violation of the Second Preliminary Injunction Order. *See ECF No. 230 at 26.*

6. Exhibit C-4 is a true and correct copy of another of the seven Honor Society webpages that appears on the "Phi Theta Kappa Lawsuit" Google search page referenced as Exhibit C-2. This webpage is nearly identical to the Exhibit A-5 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK's Motion for Contempt and Sanctions. Again, while the font size of the disclaimer has been slightly increased, the disclaimer does not appear at the top of the webpage, which is a violation of the Second Preliminary Injunction Order. *See ECF No. 230 at 26.*

7. Exhibit C-5 is a true and correct copy of another of the seven Honor Society webpages that appears on the "Phi Theta Kappa Lawsuit" Google search page referenced as Exhibit C-2. This webpage is nearly identical to the Exhibit A-2 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK's Motion for Contempt and Sanctions. In Exhibit A-2, the targeted school is Hinds Community College. In Exhibit C-5, the targeted school is Ivy Tech Community College. While the font size of the disclaimer has been slightly increased and now appears at the top of the webpage, Honor Society has still minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

8. Exhibit C-6 is a true and correct copy of another of the seven Honor Society webpages that appears on the "Phi Theta Kappa Lawsuit" Google search page referenced as Exhibit C-2. Again, the disclaimer does not appear at the top of the webpage.

9. Exhibit C-7 is a true and correct copy of another of the seven Honor Society webpages that appears on the “Phi Theta Kappa Lawsuit” Google search page referenced as Exhibit C-2. Again, the font size of the surrounding text (which is misleading) is significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

10. Exhibit C-8 is a true and correct copy of another of the seven Honor Society webpages that appears on the “Phi Theta Kappa Lawsuit” Google search page referenced as Exhibit C-2. This appears to be a landing page on Honor Society Foundation’s website that lists approximately **1250** AI-generated webpages associated with the community colleges at which PTK has chapters. Each of the 1250 AI-generated webpages appear to be nearly identical to the Exhibit A-2 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK’s Motion for Contempt and Sanctions – except that the school is different in each instance. Exhibit C-9 is a true and accurate copy of one example of the approximately 1250 AI-generated webpages. As exemplified by Exhibit C-9, for each of the approximately 1250 AI-generated webpages, while the font size of the disclaimer now appears at the top of the webpage, Honor Society has still minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

11. Exhibit C-10 is a true and correct copy of another of the seven Honor Society webpages that appears on the “Phi Theta Kappa Lawsuit” Google search page referenced as Ex. C-2. This webpage is nearly identical to the Exhibit A-4 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK’s Motion for Contempt and Sanctions. While the font size of the disclaimer has been slightly increased and now appears at the top of the webpage, Honor Society

has still minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the misleading surrounding text.

12. On December 5, 2024, I received a link to the Community College Honor Societies Survey. Exhibit C-11 is a true and accurate copy of the email I received providing access to the survey. Exhibits C-12, C-13, C-14, and C-15, collectively, are a true and accurate copy of the Community College Honor Societies Survey, as accessed on December 7, 2024.

13. On December 7, 2024, when Taft counsel accessed the survey, at the conclusion of the survey, we were redirected to a Google search page with the phrase “phi theta kappa false advertising” populated in the Google search bar. This is a slightly different Google search page than the student reported being redirected to when she completed the survey on November 29. That said, it is no less problematic. It may be that Honor Society recently updated the operation of the survey to redirect recipients to the “phi theta kappa false advertising” Google search page, rather than the “Phi Theta Kappa Lawsuit” Google search page. In any event, the results are similar. Exhibit C-16 is a true and accurate copy of the “phi theta kappa false advertising” Google search page, which Taft counsel was redirected to at the conclusion of the survey on December 7, 2024.

14. Exhibit C-17 is a true and accurate copy of one of the six Honor Society webpages that appears on the “phi theta kappa false advertising” Google search page referenced as Exhibit C-16. This webpage is nearly identical to the Exhibit A-6 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK’s Motion for Contempt and Sanctions. While the font size of the disclaimer has been slightly increased, the disclaimer does not appear at the top of the webpage, which is a violation of the Second Preliminary Injunction Order. *See* ECF No. 230 at 26.

Additionally, Honor Society has minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

15. Exhibit C-18 is a true and accurate copy of another of the six Honor Society webpages that appears on the “phi theta kappa false advertising” Google search page referenced as Exhibit C-16. This webpage is nearly identical to the Exhibit A-16 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK’s Motion for Contempt and Sanctions. While the font size of the disclaimer has been slightly increased, the disclaimer does not appear at the top of the webpage, which is a violation of the Second Preliminary Injunction Order. *See* ECF No. 230 at 26.

16. Exhibit C-19 is a true and accurate copy of another of the six Honor Society webpages that appears on the “phi theta kappa false advertising” Google search page referenced as Exhibit C-16. This webpage is nearly identical to the Exhibits B-7(a), B-8(a), B-9(a) of the Etienne Declaration (Ex. 261-1) filed in connection with PTK’s Reply in support of Motion for Contempt and Sanctions. The targeted school is different in each instance. In Exhibit C-19, the targeted school is Salem Community College. While the font size of the disclaimer has been slightly increased and appears at the top of the webpage, Honor Society has still minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

17. Exhibit C-20 is a true and correct copy of another of the six Honor Society webpages that appears on the “phi theta kappa false advertising” Google search page referenced as Exhibit C-16. This webpage targets Jackson College, Central Campus and is hosted by the Honor Society Museum. PTK was not aware of this particular version of Honor Society’s AI-

generated content at the time of the second preliminary injunction proceedings; however, it is more of the same misleading content (e.g., “Recent developments have unveiled a lawsuit against PTK, highlighting alarming allegations of false advertising and monopolistic practices.”). The smear campaign continues.

18. Exhibit C-21 is a true and correct copy of another of the six Honor Society webpages that appears on the “phi theta kappa false advertising” Google search page referenced as Exhibit C-16. This webpage is nearly identical to the Exhibit A-30 of the Etienne Declaration (Ex. 242-1) filed in connection with PTK’s Motion for Contempt and Sanctions. While the font size of the disclaimer has been slightly increased and now appears at the top of the webpage, Honor Society has still minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

19. Exhibit C-22 is a true and correct copy of another of the six Honor Society webpages that appears on the “phi theta kappa false advertising” Google search page referenced as Exhibit C-16. In this webpage hosted by Honor Society Museum, Honor Society has minimized the effect of the disclaimer by making the font size of the surrounding text (which is misleading) significantly larger than the disclaimer. This defeats the purpose of the disclaimer, which was ordered to address the surrounding misleading text.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 9th day of December 2024.

/s/ W. Michael Etienne
W. Michael Etienne
Attorney
Taft Stettinius & Hollister LLP

EXHIBIT C-1

FILED WITH REDACTIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



From: Fredrica Tyes (Phi Theta Kappa Member Services) <member.services@ptk.org>
Sent: Thursday, December 5, 2024 10:26 AM
To: Heather Allen <heather.allen@ptk.org>
Subject: [Phi Theta Kappa] Assignment: Question

You have been assigned to this ticket (#[295398](#)).



Fredrica Tyes (Phi Theta Kappa)

Dec 5, 2024, 10:25 'a0AM CST

Private note

Hi Heather! Sending this your way. If there is something we need to say please let me know. It would be great to have some talking points.



K [REDACTED] P [REDACTED]
Nov 29, 2024, 5:59 'a0PM CST

Hi! I am a member of PTK and I got an email from "honorsocietysurvey@gmail.com" and was asked to complete a survey about honor society. The survey was normal, but when I finished and went to submit it, I was redirected to a google search page about "Phi Theta Kappa Lawsuit". I just wanted to reach out and make you aware that this survey is contacting members and redirecting them to this.

You are an agent. Add a comment by replying to this email or [view ticket in Zendesk Support](#).

Ticket # 295398
Status Solved
Requester K [REDACTED] P [REDACTED]
CCs -
Group Key/Membership Services
Assignee Heather Allen
Priority -
Type Incident
Channel By Mail

This email is a service from Phi Theta Kappa.

EXHIBIT C-2

Document title: phi theta kappa lawsuit - Google Search

Capture URL: https://www.google.com/search?q=phi+theta+kappa+lawsuit&rlz=1C1GCEA_enUS1102US1102&oq=phi+theta+kappa+lawsuit&gs_lcp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRiPAjIHCAIQIRiPAjIBCDUyMTJqMGoxxqAIA&sourceid=chrome&ie=UTF-8

Page loaded at (UTC): Fri, 06 Dec 2024 17:12:13 GMT

Capture timestamp (UTC): Fri, 06 Dec 2024 17:13:13 GMT

Capture tool: 10.54.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86_64) AppleWebKit/537.36 (KHTML, like Gecko)
Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 3

Capture ID: kXpyiUKj8C6N2PEFY72tRJ

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The Phi Theta Kappa (PTK) Honor Society is involved in a lawsuit against HonorSociety.org:

Claim

PTK claims that HonorSociety.org's online actions constitute tortious interference with contractual relations under Mississippi law.

Defense

HonorSociety.org argues that all the information is truthful and that PTK cannot show how it has suffered any harm.

[Supplemental declaration](#)

[Show more](#) [⋮](#)

Phi Theta Kappa Honor Soc'y v. HonorSociety.org. - Casetext

Aug 22, 2024 — In short, PTK's Motion seeks an injunction enjoining Honor Society from posting these...

 Casetext

About PTK - Phi Theta Kappa

On November 19, 1929, the American Association of Junior Colleges (now the American Association of...

 Phi Theta Kappa Honor Society

 Casetext - CoCounsel

<https://casetext.com> › ... › SD MS › 2024 › August

Phi Theta Kappa Honor Soc'y v. HonorSociety.org.

Aug 22, 2024 — The Court finds that the plaintiffs' Motion for a Temporary Restraining Order, Preliminary Injunction and/or Gag Order should be granted in pa...

 Honor Society

<https://www.honorsociety.org> › articles › phi-theta-kappa...

Phi Theta Kappa Legal Issues: What Students and ...

Jun 4, 2024 — Misleading "Top 10%" Claims: The **lawsuit** claims **PTK** falsely asserts that students invited to join are in the "Top 10%" of their class. In ...

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Honor Society® Sues Phi Theta Kappa Over Deceptive ...

May 9, 2024 — Filed in the Southern District of Mississippi, the suit alleges that **PTK's** practices deceive students, educational institutions, and employers.

 Phi Theta Kappa Honor Society

<https://www.ptk.org> › phi-theta-kappa-sues-las-vegas-c...

Phi Theta Kappa Honor Society Sues Las Vegas Company ...

The **lawsuit** alleges that HonorSociety.org, a for-profit enterprise, has knowingly and willfully violated **PTK** registered trademarks.

 Honor Society

<https://www.honorsociety.org> › articles › phi-theta-kappa...

PR Newswire

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Honor Society® Sues Phi Theta Kappa Over Deceptive ...

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The **lawsuit** alleges that HonorSociety.org, a for-profit enterprise, has knowingly and willfully violated **PTK** registered trademarks.

Honor Society

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Phi Theta Kappa Lawsuit: Uncovering Alleged Deceptive ...

Jun 8, 2024 — A federal **lawsuit** filed by Honor Society® accuses **PTK** and its CEO, Lynn Tincher-Ladner, of engaging in deceptive practices and attempting to ...

LinkedIn · Honor Society®

6 reactions · 5 months ago :

Phi Theta Kappa: Shocking Allegations & Unmasking the ...

Accusations of deceptive practices, monopolistic behavior, and unethical conduct have been brought to light in a recent **lawsuit** filed by Honor Society.

Honor Society Foundation

<https://honorsocietyfoundation.org> > phi-theta-kappa-la... :

Phi Theta Kappa Lawsuit: PTK Deceptive Practices and ...

May 17, 2024 — The **lawsuit**, filed in the Southern District of Mississippi, accuses **PTK** of deceptive practices and attempting to monopolize the community ...

HonorSociety.com

<https://honorsociety.com> > phi-theta-kappa-ivy-tech-co... :

Phi Theta Kappa Warning! Caution at Ivy Tech Community

...

Jul 18, 2024 — The **lawsuit** raises serious concerns about false advertising and monopolistic practices. **PTK** is accused of falsely claiming members are in the "Top..."

Honor Society Museum

<https://honorsocietymuseum.org> > phi-theta-kappa-is-su... :

Phi Theta Kappa Is Sued: Disturbing Deceptive Practices ...

May 17, 2024 — This **lawsuit** alleges deceptive practices and monopolistic strategies executed by **PTK** and its CEO, Lynn Tincher-Ladner.

Honor Society Foundation

<https://honorsocietyfoundation.org> > tag > ptk-lawsuit :

PTK Lawsuit

Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by **PTK** on April 20, 2022 for False Designation of Origin.

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EXHIBIT C-3

Document title: Phi Theta Kappa Legal Issues: What Students and Educators Need to Know | Honor Society - Official Honor Society® Website

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Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 5

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Display Name: arose



Phi Theta Kappa Legal Issues: What Students and Educators Need to Know

Jun 04,2024



Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Phi Theta Kappa (PTK), the prominent honor society for community college students, is under legal scrutiny following a [federal lawsuit](#) that accuses the organization of deceptive practices and monopolistic behavior. Filed by Honor Society® in the Southern District of Mississippi, the lawsuit alleges that PTK's practices mislead students, educational institutions, and employers. Here's a detailed look at the allegations and what they mean for the community college sector.

Key Allegations

The lawsuit brings several serious charges against [PTK and its CEO, Lynn Tincher-Ladner](#). The primary allegations include:

- 1. Misleading "Top 10%" Claims:** The lawsuit claims PTK falsely asserts that students invited to join are in the "Top 10%" of their class. In reality, PTK's criteria allow a much larger percentage of students to qualify, misleading them about the exclusivity of the honor society. For example, at Oakton Community College, 44% of students meet PTK's GPA standard, far exceeding the top 10%.
- 2. Questionable Letters of Recommendation:** PTK is accused of issuing letters of recommendation signed by CEO [Lynn Tincher-Ladner](#), claiming the member is in the top 10% at their school without any factual basis. This practice allegedly deceives students, colleges, and employers about the merit of

ABOUT THE AUTHOR

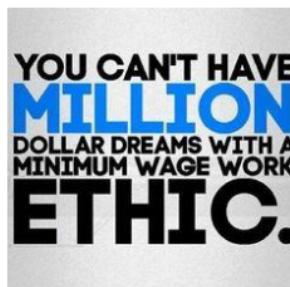


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2. **Questionable Letters of Recommendation:** PTK is accused of issuing letters of recommendation signed by CEO [Lynn Tincher-Ladner](#), claiming the member is in the top 10% at their school without any factual basis. This practice allegedly deceives students, colleges, and employers about the merit of PTK membership.
3. **Dubious Scholarship Promotions:** The lawsuit alleges PTK promotes access to \$246 million in exclusive scholarships, which are actually broadly available transfer scholarships. This misrepresentation allegedly leads students to pay for PTK membership under false pretenses. PTK also claims its "average member gets \$2,500 a year" in scholarships, which is disputed in the lawsuit.
4. **Anticompetitive Tactics:** The lawsuit highlights PTK's alleged attempts to monopolize the community college honor society market through aggressive and deceptive practices. This includes falsely claiming to be the "only official" honor society and selling members' personal information without their consent.

Educational Institutions' Perspective

Educational institutions that partner with PTK might need to reassess their affiliations and ensure they are not inadvertently supporting misleading practices. The lawsuit encourages colleges to scrutinize Phi Theta Kappa and verify the claims they make to students.

Broader Educational Implications

This lawsuit against PTK serves as a wake-up call for all honor societies and educational organizations. It underscores the importance of transparency, ethical behavior, and accountability in practices that significantly affect students' futures.

Staying Informed

As the lawsuit unfolds, staying informed about its developments is crucial. This case highlights the need for students, educators, and institutions to be vigilant about the practices of organizations they engage with.

For detailed information about the lawsuit, you can read the full details [here](#).

Conclusion

This lawsuit is a crucial step towards ensuring that such organizations operate transparently and ethically. Students and educators must stay informed and advocate for practices that genuinely reflect the values of academic excellence and honesty.

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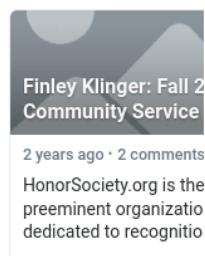
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EXHIBIT C-4

Document title: Phi Theta Kappa Lawsuit: Uncovering Alleged Deceptive Practices and Monopolization | Honor Society - Official Honor Society® Website

Capture URL: <https://www.honsorsociety.org/articles/phi-theta-kappa-lawsuit-uncovering-alleged-deceptive-practices-and-monopolization>

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Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 5

Capture ID: ernRPxSjSPmrnVMWiYwJQz

Display Name: arose



Phi Theta Kappa Lawsuit: Uncovering Alleged Deceptive Practices and Monopolization

Jun 08, 2024



Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Phi Theta Kappa (PTK), a known organization for community college students, is currently facing a significant legal challenge. A [federal lawsuit](#) filed by Honor Society® accuses PTK and its CEO, [Lynn Tincher-Ladner](#), of engaging in deceptive practices and attempting to monopolize the community college honor society market. This article delves into the key allegations and their potential impact on students and educational institutions.

The Allegations

The lawsuit, filed in the Southern District of Mississippi, outlines several troubling practices allegedly masterminded by PTK's leadership. Here are the main points:

1. False "Top 10%" Claims: PTK is accused of falsely claiming in solicitations that invited students are in the "Top 10%" of their class. The criteria set by PTK allow a much higher percentage of students to qualify, misleading many about the exclusivity of PTK membership. For example, at Oakton Community College, 44% of students meet PTK's 3.5+ GPA standard, far exceeding the actual "Top 10%".



ABOUT THE AUTHOR



HonorSociety.org Member Services
is a student at

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qualify, misleading many about the exclusivity of PTK membership. For example, at Oakton Community College, 44% of students meet PTK's 3.5+ GPA standard, far exceeding the actual "Top 10%".

2. Alleged Fraudulent Letters of Recommendation: The lawsuit alleges that PTK issues letters of recommendation, signed by CEO Lynn Tincher-Ladner, falsely claiming that the member is in the top 10% of their school. This practice allegedly deceives students, colleges, and employers about the true merit of PTK membership.
3. Misleading Scholarship Claims: PTK is also accused of promoting exclusive access to \$246 million in scholarships, which are actually broadly available university transfer scholarships. This misrepresentation leads students to pay for PTK membership under false pretenses. Additionally, PTK allegedly advertises that its "average member gets \$2,500 a year" in transfer scholarships, which is claimed to be false.
4. Anticompetitive Conduct: The lawsuit highlights PTK's alleged efforts to monopolize the community college honor society market by employing aggressive and deceptive tactics. This includes falsely claiming to be the "only official" honor society and selling members' personal information without consent.

Broad Awareness

The legal battle against PTK could have far-reaching implications for the purported honor society and its members. It raises important questions about transparency and ethical practices within organizations that claim to uphold high academic and ethical standards. The outcome of this lawsuit could prompt other educational institutions and academic societies to re-evaluate their practices and ensure they are not engaging in similar deceptive tactics.

What's Next?

As the lawsuit progresses, it will be crucial to monitor its developments and understand how they affect the broader educational community. This case underscores the importance of transparency and accountability in organizations that hold significant influence over students' academic and professional futures.

For more detailed coverage of the ongoing legal battle, you can read the full lawsuit details [here](#).

Conclusion

The allegations against Phi Theta Kappa highlight the need for greater scrutiny and transparency in honor societies. As this lawsuit unfolds, it will serve as a critical reminder of the importance of integrity and accountability in educational organizations. Students and educators alike should stay informed and advocate for practices that truly reflect the values of academic excellence and ethical conduct.

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EXHIBIT C-5

Document title: Phi Theta Kappa Warning! Caution at Ivy Tech Community College, Marion Campus, Beta Phi Tau Chapter | HonorSociety.com

Capture URL: <https://honorsociety.com/phi-theta-kappa-ivy-tech-community-college-marion-campus/>

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Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Red Alert regarding Phi Theta Kappa at Ivy Tech Community College, Marion Campus and the PTK Beta Phi Tau Chapter!

This is a public service announcement and opinion in the interest of protecting students and community colleges. This website is not affiliated with PTK Beta Phi Tau Chapter or Phi Theta Kappa.

Dear Ivy Tech Community College, Marion Campus Community,

We want to inform you about a lawsuit filed against Phi Theta Kappa (PTK), an honor society known across community colleges. The lawsuit raises serious concerns about false advertising and monopolistic practices.

PTK is accused of falsely claiming members are in the "Top 10%" of their class, when the actual percentage is much higher, misleading potential members.

Phi Theta Kappa has been alleged to make misleading scholarship claims. In member invitations PTK has said that members have exclusive access to \$246 million in scholarships and that the average member receives \$2,500 per year. However, significant amounts of these scholarships are not exclusive to PTK members; they are available generally to all students regardless of PTK membership. This false exclusivity towards scholarships eligibility allegedly misleads students into believing they will receive special access to general financial benefits by joining PTK.

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Case 3:22-cv-00208-CWR-RPM Document 328-1 Filed 12/09/24

Phi Theta Kappa has been alleged to make misleading scholarship claims. In member invitations PTK has said that members have exclusive access to \$246 million in scholarships and that the average member receives \$2,500 per year. However, significant amounts of these scholarships are not exclusive to PTK members; they are available generally to all students regardless of PTK membership. This false exclusivity towards scholarships eligibility allegedly misleads students into believing they will receive special access to general financial benefits by joining PTK.

Additionally, PTK has allegedly engaged in monopolistic practices, including aggressive tactics to dominate the honor society market and selling members' personal information without consent.

The lawsuit questions the leadership within PTK, including current CEO Lynn Tincher-Ladner, highlighting the need for greater accountability and transparency.

We are committed to protecting students from misleading practices. We encourage everyone to stay informed and consider these implications carefully.

For more information, please refer to these resources:

- Phi Theta Kappa Lawsuit: PTK Deceptive Practices and Attempted Monopoly
- Is Phi Theta Kappa Worth It?
- Is Phi Theta Kappa a Big Deal? No, It's Not
- Lynn Tincher-Ladner: Alleged Misleading Mastermind

We believe that an informed community is a strong community. If you have any questions or concerns, please reach out to ptklawsuit@gmail.com.

Background: The PTK CEO, Lynn Tincher-Ladner, allegedly masterminded these deceptive practices against community college students and institutions and should be held accountable. For more information about the PTK lawsuit, visit www.ptklawsuit.com. To post or follow the topic on social media, use #PTKlawsuit.



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EXHIBIT C-6

Document title: Phi Theta Kappa: Shocking Allegations & Unmasking the Truth.

Capture URL: <https://www.linkedin.com/pulse/phi-theta-kappa-shocking-allegations-unmasking-truth-honorssociety-fiuqc>

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Time to unmask the truth at Phi Theta Kappa.

Phi Theta Kappa: Shocking Allegations & Unmasking the Truth.



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Published Jun 12, 2024

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Disclaimer: The author of this article is not a neutral party in the referenced litigation.

HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Phi Theta Kappa (PTK), the self-proclaimed "world's largest honor society for community college students", is facing a **firestorm of allegations** that could forever alter its reputation. Accusations of deceptive practices, monopolistic behavior, and unethical conduct have been **brought to light in a recent lawsuit** filed by Honor Society®. This article delves deep into these claims, uncovering the potential impact on students and the broader educational community.

The Allegations: What PTK Is Accused Of

The lawsuit, filed in the Southern District of Mississippi, presents a troubling picture of PTK's operations under the leadership of **CEO Lynn Tincher-Ladner**. Here are the key allegations:

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key allegations:

- 1. Deceptive Exclusivity Claims:** PTK allegedly misleads students by claiming that those invited to join are in the "Top 10%" of their class. The reality, according to the lawsuit, is that PTK's criteria allow a much larger percentage of students to qualify. This false exclusivity can significantly mislead students about the value and prestige of their membership.
- 2. Fraudulent Letters of Recommendation:** The lawsuit contends that PTK issues letters of recommendation, signed by CEO Lynn Tincher-Ladner, falsely stating that the member is in the top 10% of their class. These letters are purportedly issued without any factual basis, deceiving students, educational institutions, and potential employers.
- 3. Misleading Scholarship Promises:** PTK is accused of promoting access to \$246 million in scholarships as exclusive to its members, when these scholarships are actually available to all students. Additionally, the claim that the "average member gets \$2,500 a year" in scholarships is disputed, suggesting that many students are misled about the financial benefits of joining PTK.
- 4. Anticompetitive Behavior:** The lawsuit highlights PTK's alleged attempts to dominate the community college honor society market through aggressive tactics. These include falsely claiming to be the "only" and "official" honor society and selling members' personal information without their consent. Such practices not only mislead students but also stifle competition in the academic honor society landscape.

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The Student Impact: Misled and Disillusioned

For students, these allegations are deeply concerning. If proven true, they suggest that many students have been enticed to join PTK under false pretenses, potentially wasting time and money on an organization that does not deliver on its promises. The implications for their academic and professional futures could be significant.

Educational Institutions: Re-Evaluating PTK

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Educational Institutions: Re-Evaluating PTK

Colleges and universities that host PTK chapters may need to reconsider. The allegations suggest a need for greater scrutiny and due diligence to ensure that honor societies and other academic organizations operate transparently and ethically. Institutions must protect their students from misleading practices and ensure that any endorsed organization truly benefits its members.

The Bigger Picture: A Call for Integrity and Accountability

This lawsuit against PTK underscores the critical need for integrity and accountability in educational organizations. It serves as a wake-up call for all higher education to uphold the highest ethical standards and ensure that their practices are transparent and honest. Students and educators must remain vigilant, advocating for practices that genuinely support academic excellence and personal development.

A Call to Action

The allegations against Phi Theta Kappa highlight significant issues that need addressing to protect students and uphold the integrity of academic honor societies. This lawsuit is a crucial step towards ensuring that such organizations operate with transparency and accountability. The educational community must rally for reforms that prioritize the genuine interests of students and the true spirit of academic achievement. #PTKlawsuit

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Phi Theta Kappa Is Sued: Disturbing Deceptive Practices And Monopolistic Tactics

■ May 17, 2024 ■ PTK Lawsuit, Uncategorized ■ Abuse, Community College, Protect Students, PTK Lawsuit



Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

The Honor Society Museum is committed to protecting students and preserving the integrity and transparency of academic institutions. In line with this mission, we bring to light a significant legal battle that has unfolded against Phi Theta Kappa (PTK), known as "the" community college honor society. This lawsuit alleges deceptive practices and monopolistic strategies executed by PTK and its CEO, Lynn Tincher-Ladner.

ALLEGATIONS OF MISLEADING PRACTICES

The federal lawsuit, filed in the Southern District of Mississippi, highlights several alarming practices. Among the most concerning are:

False "Top 10%" Claims: PTK is accused of misleading students by claiming in their membership invitations that the recipients are in the "Top 10%" of their class. This assertion is used to encourage students to pay membership fees. However, the criteria set by PTK actually allow a much larger percentage of students to qualify. For instance, at Oakton Community College, 44% of students meet PTK's 3.5+ GPA requirement, which significantly exceeds the true "Top 10%" standard. This misrepresentation creates a false sense of exclusivity.

Questionable Letters of Recommendation: The lawsuit also addresses PTK's practice of issuing letters of recommendation, signed by CEO Lynn Tincher-Ladner, stating that the PTK member is in the top 10% at their school. This claim is often made without any factual basis, deceiving students, educational institutions, and potential employers about the member's academic standing.

Misleading Scholarship Information: PTK allegedly promotes access to \$246 million in scholarships as an exclusive benefit of membership. In reality, these scholarships are generally available to all students, not just PTK members. Additionally, PTK claims that the "average member gets \$2,500 a year" in transfer scholarships, which is reportedly false. Such statements mislead students about the financial benefits of joining PTK.

ANTICOMPETITIVE CONDUCT

The lawsuit further accuses PTK of engaging in practices intended to stifle competition within the community college honor society market. By misleading students and institutions, PTK allegedly attempts to monopolize this market, restricting students' options for honor society memberships.

CALL TO ACTION

The Honor Society Museum encourages those who have been affected by PTK's practices to come forward. It is vital to protect the academic community from these alleged predatory behaviors. If you have experienced misleading practices by PTK, please reach out to your state attorney general's office or the Better Business Bureau.

For those with additional insights or information regarding PTK's practices, we urge you to contact PTKLawsuit@gmail.com. Your privacy and confidentiality will be respected.

For more details about the lawsuit, visit www.ptklawsuit.com. To participate in the discussion on social media, use the hashtag #PTKLawsuit.

Together, we can uphold the values of integrity and transparency in honor societies, ensuring that these organizations truly honor their members and their commitments.

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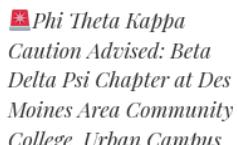
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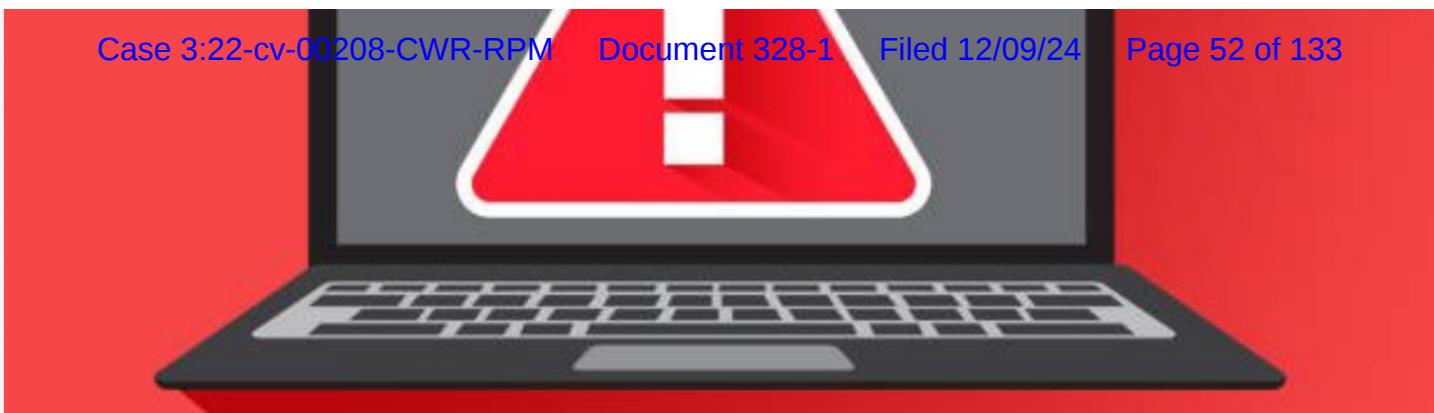
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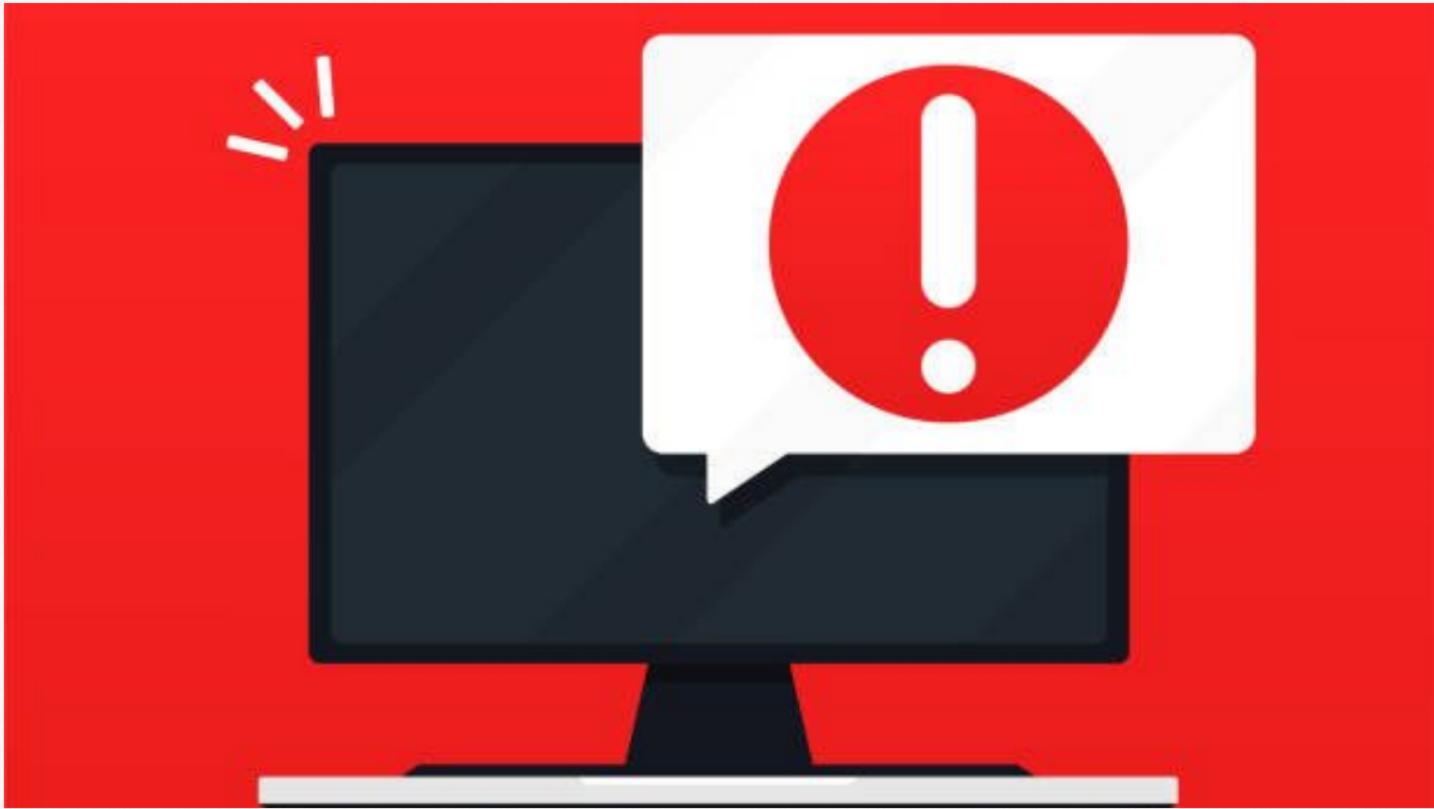
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PHI THETA KAPPA ALERT AT SUNY COLLEGE OF TECHNOLOGY AT ALFRED, MAIN CAMPUS: CAUTION ADVISED REGARDING THE PTK ALPHA SIGMA MU CHAPTER



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Dear SUNY College of Technology at Alfred, Main Campus Community,

We are reaching out to you with an urgent message regarding the honor society Phi Theta Kappa (PTK), which has a presence at this campus. HSF is not related to this

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Theta Kappa (PTK), which has a presence at this campus. HSF is not related to this campus, but recent developments have brought to light shocking allegations against PTK that we believe every member of our community should be aware of.

Alarming Allegations Against PTK

PTK is currently facing a lawsuit that accuses the organization of engaging in serious deceptive practices and monopolistic tactics. These allegations are not just minor infractions; they represent a significant breach of trust that could severely impact community college students.

False Advertising Claims:

- Top 10% Misrepresentation:** PTK claims that its members are in the "Top 10%" of their class. However, evidence shows that the actual percentage of qualifying students is much higher, misleading students about the exclusivity and value of their membership.
- Misleading Scholarship Promises:** PTK has been alleged of making misleading scholarship claims. They suggest that members have exclusive access to \$246 million in scholarships and that the average member receives \$2,500 per year. However, many of these scholarships are not exclusive to PTK members; they are available to all students. This false exclusivity misleads students into believing they will receive unique financial benefits by joining PTK.

Monopolistic Practices:

- Aggressive Tactics:** PTK has allegedly used aggressive methods to dominate the community college honor society market, including falsely claiming to be "the only official" honor society and selling members' personal information without consent.

Leadership Under Scrutiny

The current CEO, Lynn Tincher-Ladner, is at the center of these allegations. The need for accountability and transparency within PTK has never been more critical. Her leadership has come into question, and it is imperative that we hold those in power responsible for their actions.

A Call to Action

As a community, we must take a stand against these deceptive practices to protect our students and ensure their educational experience is not marred by misleading information. This is not just about one honor society; it is about safeguarding the integrity of our academic institutions and standing up for social justice.

We urge you to:

- Stay Informed:** Educate yourself about the allegations and understand their potential impact on our students.
- Speak Out:** Share this information with others and raise awareness about the issues surrounding PTK.
- Demand Accountability:** Call for greater transparency and accountability from PTK's leadership.

For more information and to join the movement for transparency and justice, please refer to these resources:

- Phi Theta Kappa Lawsuit: PTK Deceptive Practices and Attempted Monopoly
- Is Phi Theta Kappa Worth It?
- Is Phi Theta Kappa a Big Deal? No, It's Not

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- Lynn Tincher-Ladner: Alleged Misleading Mastermind
- Phi Theta Kappa Sexual Harassment: Stunning Allegations Revisited
- Phi Theta Kappa Embezzlement: A Deep Dive into the Allegations
- Phi Theta Kappa Employee Reviews: Unmasking the PTK Workplace Environment
- Phi Theta Kappa Reviews: Real Student Experiences
- Trustpilot Reviews on PTK

Together, we can make a difference and ensure that our students receive the honest and transparent support they deserve. If you have any questions or concerns, please reach out to PTKLawsuit@gmail.com.

Stand with us in this fight for justice and integrity.

—

This is a public service announcement in the interest of protecting students and community colleges. This website is not affiliated with Phi Theta Kappa.

The PTK CEO, Tincher-Ladner, allegedly masterminded these deceptive practices against community college students and institutions and should be held accountable. For more information about the PTK lawsuit, visit www.ptklawsuit.com. To post or follow the topic on social media, use #PTKlawsuit.

Call for Action:

If you have insights or information about PTK's alleged deceptive practices, please email PTKLawsuit@gmail.com.



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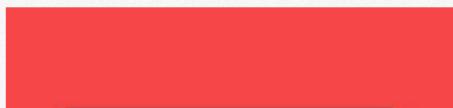
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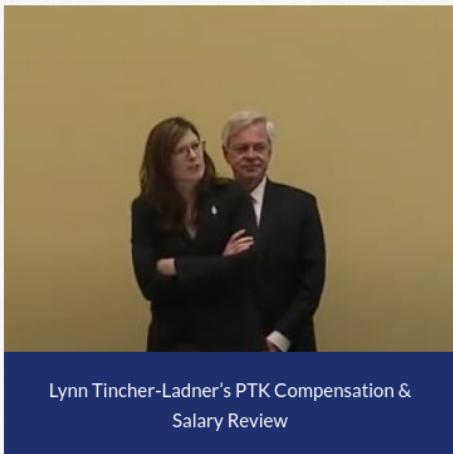
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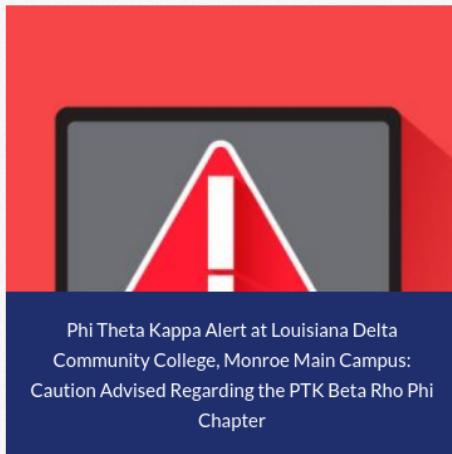
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PHI THETA KAPPA LAWSUIT: PTK DECEPTIVE PRACTICES AND ATTEMPTED MONOPOLY



Phi Theta Kappa Red Alert

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In a bold move to defend students, parents, and the educational community, a lawsuit was filed against Phi Theta Kappa (PTK) and its CEO, Lynn Tincher-Ladner. The lawsuit, filed in the Southern District of Mississippi, accuses PTK of deceptive practices and attempting to monopolize the community college honor society market. The allegations claim that PTK's actions have misled students, educational institutions, and employers. Read the news release or visit the PTKlawsuit.com portal.

The Allegations Against Phi Theta Kappa

The lawsuit outlines several disturbing practices allegedly orchestrated by CEO Lynn Tincher-Ladner, including:

False "Top 10%" Claims: PTK is accused of falsely stating in their solicitations that invited students are in the "Top 10%" of their class to entice them to pay membership fees. In reality, PTK's criteria allow a much larger percentage of students to qualify. For instance, at Oakton Community College, 44% of students meet PTK's 3.5+ GPA standard—far exceeding the actual "Top 10%." This misleads students about the exclusivity of PTK membership.

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False "Top 10%" Claims: PTK is accused of falsely stating in their solicitations that invited students are in the "Top 10%" of their class to entice them to pay membership fees. In reality, PTK's criteria allow a much larger percentage of students to qualify. For instance, at Oakton Community College, 44% of students meet PTK's 3.5+ GPA standard—far exceeding the actual "Top 10%." This misleads students about the exclusivity of PTK membership.

Fraudulent Letters of Recommendation: PTK allegedly issues letters of recommendation, signed by CEO Lynn Tincher-Ladner, claiming that the PTK member is in the top 10% at their school—without any factual basis. This deception misleads students, colleges, and employers regarding the true merit of PTK membership.

Misleading Scholarship Claims: PTK is accused of promoting exclusive access to \$246 million in scholarships, which are actually widely available university transfer scholarships. This misrepresentation leads students to pay for PTK membership under false pretenses. Additionally, PTK allegedly claims that its "average member gets \$2,500 a year" in transfer scholarships, which is false. These misleading statements deceive students about the benefits of PTK membership.

These deceptive tactics, the lawsuit claims, have enabled PTK to misappropriate significant funds from students by exploiting their trust and aspirations. Moreover, PTK is accused of selling and sharing member data under false pretenses, further compromising student privacy and trust.

Monopolistic Conduct and Suppression of Competition

The lawsuit also accuses PTK of engaging in anticompetitive behavior aimed at excluding competition from the community college market. Mikal Calvert states, "Phi Theta Kappa's actions have unfairly restricted the choices for honor society memberships in community colleges, misleading countless students. This lawsuit seeks to dismantle these falsehoods and promote a market that truly values inclusivity and excellence."

Call to Action

The Honor Society Foundation urges anyone affected by PTK's deceptive practices to come forward. "We must protect vulnerable students and educational institutions from these alleged predatory behaviors," emphasizes Calvert. "We encourage anyone who believes they have been misled by Phi Theta Kappa to contact their state attorney general's office or the Better Business Bureau."

If you have information about PTK's deceptive practices, please email PTKLawsuit@gmail.com. Your privacy and confidentiality will be respected.

For more information about the lawsuit, visit www.ptklawsuit.com. To join the conversation on social media, use #PTKLawsuit.

By working together, we can ensure that honor societies truly honor their members and uphold the highest ethical standards.

Honor Society Foundation

[See Full Bio >](#)

• abuse • PTK Lawsuit

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Phi Theta Kappa Alert at Washburn University, Topeka Campus: Caution

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About

The Honor Society Foundation exists first and foremost to help achievers like you build relationships with similar values-driven and goal-oriented people and organizations, while striving to provide Scholarships those who go above and beyond.



PREVIOUS STORY

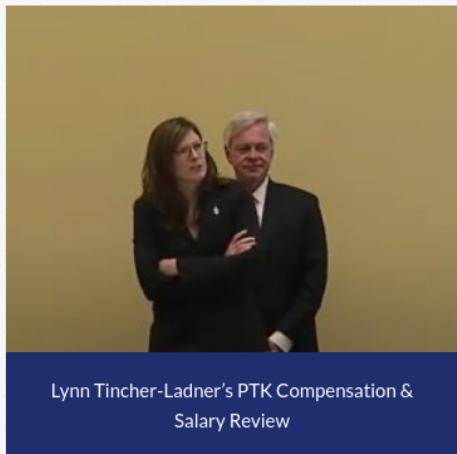
Phi Theta Kappa Alert at Washburn
University, Topeka Campus: Caution
Advised Regarding the PTK Alpha Mu
Omicron Chapter

NEXT STORY

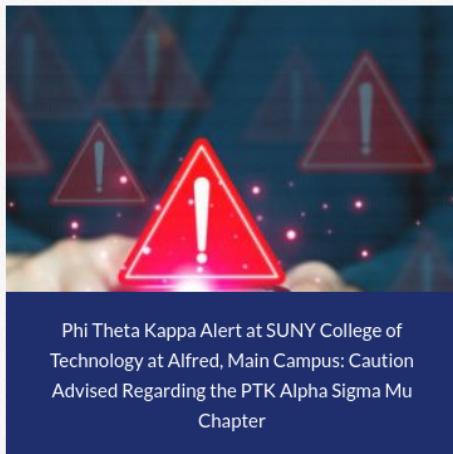
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Leave your comment

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EXHIBIT C-11

Etienne, Mike

From: Deshauntae Anderson <dande110@email.tjc.edu>
Sent: Thursday, December 5, 2024 7:24 PM
To: Etienne, Mike
Subject: Fwd: Action Needed



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From: honorsocietysurvey@gmail.com via SurveyMonkey <member@surveymonkeyuser.com>

Date: Mon, Dec 2, 2024 at 5:09 PM

Subject: Action Needed

To: Deshauntae Anderson <dande110@email.tjc.edu>

Community College Honor Societies Survey

We recently contacted you about a survey, but haven't received your responses. We'd really appreciate your participation.

Click the button below to start or continue the survey. Thank you for your time.

[Begin Survey](#)

Please do not forward this email as its survey link is unique to you.

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EXHIBIT C-12

Document title: Community College Honor Societies Survey

Capture URL: https://www.surveymonkey.com/r/?sm=DOoPzotxMVXU_2FdjappMITgKoEKE9nUspZQaGiEY_2BQHqEy0WMY4pH_2FZYEd_2FeG6lw5

Page loaded at (UTC): Sat, 07 Dec 2024 20:26:53 GMT

Capture timestamp (UTC): Sat, 07 Dec 2024 20:27:41 GMT

Capture tool: 10.54.0

Collection server IP: 54.145.42.72

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Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 4

Capture ID: tw7Ko8tJagbAFunEQ96vVt

Display Name: RSmoot

Community College Honor Societies Survey

1. Which honor societies have you **HEARD OF** while in Community College?

- Delta Alpha Pi [For Disabilities]
- Sigma Kappa Delta [For English]
- Phi Sigma Pi [Honors Fraternity]
- SALUTE [For Veterans]
- Psi Beta [For Psychology]
- National Adult Education Honor Society (NAEHS)
- Kappa Beta Delta [For Business]
- OADN Alpha Delta Nu [For Nursing]
- Society for Collegiate Leadership & Achievement (SCLA)
- Mu Alpha Theta [For Mathematics]
- Phi Rho Pi [For Forensics]
- National Society of Leadership & Success (NSLS)
- Honor Society® (HonorSociety.org)
- NSNA Leadership University Honor Society [For Nursing]
- Phi Theta Kappa (PTK)
- Alpha Beta Gamma [For Business]
- Alpha Beta Kappa [General]
- National Society of Collegiate Scholars (NSCS)
- National Technical Honor Society (NTHS)
- Other (please specify)
- None of the above

2. Which honor societies have you **JOINED** while in Community College?

- Alpha Beta Gamma [For Business]
- Society for Collegiate Leadership & Achievement (SCLA)

2. Which honor societies have you JOINED while in Community College?

- Alpha Beta Gamma [For Business]
- Society for Collegiate Leadership & Achievement (SCLA)
- Phi Rho Pi [For Forensics]
- Mu Alpha Theta [For Mathematics]
- National Society of Leadership & Success (NSLS)
- Phi Sigma Pi [Honors Fraternity]
- Kappa Beta Delta [For Business]
- National Society of Collegiate Scholars (NSCS)
- Psi Beta [For Psychology]
- Delta Alpha Pi [For Disabilities]
- NSNA Leadership University Honor Society [For Nursing]
- National Adult Education Honor Society (NAEHS)
- Phi Theta Kappa (PTK)
- OADN Alpha Delta Nu [For Nursing]
- SALUTE [For Veterans]
- Alpha Beta Kappa [General]
- Sigma Kappa Delta [For English]
- Honor Society® (HonorSociety.org)
- National Technical Honor Society (NTHS)
- Other (please specify)
- None of the above

3. Have you been invited to Phi Theta Kappa (PTK) ever?

- Yes
- No

National Adult Education Honor Society (NAEHS) Phi Theta Kappa (PTK) OADN Alpha Delta Nu [For Nursing] SALUTE [For Veterans] Alpha Beta Kappa [General] Sigma Kappa Delta [For English] Honor Society® (HonorSociety.org) National Technical Honor Society (NTHS) Other (please specify)
 None of the above

3. Have you been invited to Phi Theta Kappa (PTK) ever?

 Yes No[NEXT](#)

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EXHIBIT C-13

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Page loaded at (UTC): Sat, 07 Dec 2024 20:27:47 GMT

Capture timestamp (UTC): Sat, 07 Dec 2024 20:28:12 GMT

Capture tool: 10.54.0

Collection server IP: 54.145.42.72

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Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 3

Capture ID: 6GxH6XD8qeVPqZ2VPtQLS4

Display Name: RSmoot

Community College Honor Societies Survey

4. How did you receive your invitation to Phi Theta Kappa (PTK)?

5. What was your GPA at the time of being invited/enrolling in PTK?

6. Did you pay dues and join Phi Theta Kappa (PTK)?

Yes

No

NEXT

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Community College Honor Societies Survey

4. How did you receive your invitation to Phi Theta Kappa (PTK)?

5. What was your GPA at the time of being invited/enrolling in PTK?

6. Did you pay dues and join Phi Theta Kappa (PTK)?

- Yes
- No

NEXT

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EXHIBIT C-14

Document title: Community College Honor Societies Survey

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Page loaded at (UTC): Sat, 07 Dec 2024 20:28:22 GMT

Capture timestamp (UTC): Sat, 07 Dec 2024 20:28:50 GMT

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Browser engine: Mozilla/5.0 (X11; Linux x86_64) AppleWebKit/537.36 (KHTML, like Gecko)
Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 2

Capture ID: 73EidkTaMY44ZheHBnpPLE

Display Name: RSmoot

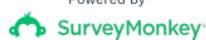
Community College Honor Societies Survey

7. How satisfied are you with your PTK membership?

- Very satisfied
- Satisfied
- Neutral
- Dissatisfied
- Very dissatisfied

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EXHIBIT C-15

Document title: Community College Honor Societies Survey

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Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86_64) AppleWebKit/537.36 (KHTML, like Gecko)
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Operating system: Linux (Node 20.17.0)

PDF length: 4

Capture ID: mLvh9fJYwQd125Q6XKgLZ

Display Name: RSmoot

Community College Honor Societies Survey

8. Please elaborate on why you are dissatisfied with PTK. The truth is important and your opinion matters!

9. If you were offered a refund of your PTK Membership, would you want to be refunded?

- Yes
- No

10. What do you like least about Phi Theta Kappa (PTK)?

11. Diversity, inclusion and belonging

- Extremely important
- Very important
- Somewhat important
- Not so important
- Not at all important

12. Which race/ethnicity best describes you? (Please choose only one.)

12. Which race/ethnicity best describes you? (Please choose only one.)

- American Indian or Alaskan Native
- Asian / Pacific Islander
- Black or African American
- Hispanic
- White / Caucasian
- Multiple ethnicity / Other (please specify)

* 13. How likely is it that you would recommend Phi Theta Kappa (PTK) to a friend or colleague?



Thank you for very much for sharing your knowledge and opinions on the community college honor society space.

[NEXT](#)

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12. Which race/ethnicity best describes you? (Please choose only one.)

- American Indian or Alaskan Native
- Asian / Pacific Islander
- Black or African American
- Hispanic
- White / Caucasian
- Multiple ethnicity / Other (please specify)

* 13. How likely is it that you would recommend Phi Theta Kappa (PTK) to a friend or colleague?



Thank you very much for sharing your knowledge and opinions on the community college honor society space.

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Document title: phi theta kappa false advertising - Google Search
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Capture timestamp (UTC): Sat, 07 Dec 2024 20:30:53 GMT
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Operating system: Linux (Node 20.17.0)
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 Honor Society
<https://www.honorsociety.org/phi-theta-kappa-lawsuit> :

Phi Theta Kappa Lawsuit

May 9, 2024 — Filed in the Southern District of Mississippi, the suit alleges that PTK's practices deceive students, educational institutions, and employers.

People also ask :

What is the Phi Theta Kappa controversy? 

Is Phi Theta Kappa a legitimate honor society? 

Can you get kicked out of Phi Theta Kappa honor society? 

How prestigious is Phi Theta Kappa? 

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 Honor Society
<https://www.honorsociety.org/articles/unmasking-lyn...> :

Unmasking Lynn Tincher-Ladner: The Allegations of False ...

Jun 16, 2024 — Recent allegations have surfaced, accusing PTK of **false advertising** and deceptive practices. This article aims to provide a detailed analysis...

 PR Newswire
<https://www.prnewswire.com/news-releases/honor-so...> :

Honor Society® Sues Phi Theta Kappa Over Deceptive ...

May 9, 2024 — Honor Society has filed claims in a federal **lawsuit** against **Phi Theta Kappa (PTK)** and its CEO, Lynn Tincher-Ladner, accusing them of misleading...

 Casetext - CoCounsel
<https://casetext.com/.../SD MS/2024/August> :

Phi Theta Kappa Honor Soc'y v. HonorSociety.org.

Aug 22, 2024 — Honor Society's posts about an alleged monopoly, **false advertising**, and cybersquatting relate to or restate the counts pled in its counter-...

 Honor Society Foundation
<https://honorsocietyfoundation.org/phi-theta-kappa-sa...> :

Phi Theta Kappa at Salem Community College, Carney's ...

The **lawsuit** raises serious concerns about **false advertising** and monopolistic practices. PTK is accused of falsely claiming members are in the "Top 10%" of ...

 Honor Society Museum
<https://honorsocietymuseum.org/phi-theta-kappa-jack...> :

Phi Theta Kappa Alert: Is PTK Worth It at Jackson College ...

False Advertising Claims: PTK is accused of misleadingly claiming that its members are in the "Top 10%" of their class, whereas the actual percentage of ...

 collegebudget.com
<https://collegebudget.com/2024/May/21> :

Lynn Tincher-Ladner & Phi Theta Kappa Are Sued for False ...

May 21, 2024 — This includes allegedly **deceptive marketing** tactics and claims intended to stifle competition and limit student options, all orchestrated to ...

PRN PRNEWSWIRE

<https://www.prnewswire.com> > news-releases > honor-so... :

Honor Society® Sues Phi Theta Kappa Over Deceptive ...

May 9, 2024 — Honor Society has filed claims in a federal **lawsuit** against **Phi Theta Kappa (PTK)** and its CEO, Lynn Tincher-Ladner, accusing them of misleadin...

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<https://casetext.com> > ... > SD MS > August :

Phi Theta Kappa Honor Soc'y v. HonorSociety.org.

Aug 22, 2024 — Honor Society's posts about an alleged monopoly, **false advertising**, and cybersquatting relate to or restate the counts pled in its counter-...

 Honor Society Foundation

<https://honorsocietyfoundation.org> > phi-theta-kappa-sa... :

Phi Theta Kappa at Salem Community College, Carney's ...

The **lawsuit** raises serious concerns about **false advertising** and monopolistic practices. **PTK** is accused of falsely claiming members are in the "Top 10%" of ...

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<https://honorsocietymuseum.org> > phi-theta-kappa-jack... :

Phi Theta Kappa Alert: Is PTK Worth It at Jackson College ...

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 collegebudget.com

<https://collegebudget.com> > 2024 > May > 21 :

Lynn Tincher-Ladner & Phi Theta Kappa Are Sued for False

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May 21, 2024 — This includes allegedly **deceptive marketing** tactics and claims intended to stifle competition and limit student options, all orchestrated to ...

 Honor Society Museum

<https://honorsocietymuseum.org> > ptk-carrington-colleg... :

Beta Phi Alpha Chapter at Carrington College, San ...

Jun 22, 2024 — Key Allegations Against **PTK**. **PTK** stands accused of **false advertising** that its members are in the "Top 10%" of their class. Investigations...

 Casetext - CoCounsel

<https://casetext.com> > ... > SD MS > 2024 > March :

Phi Theta Kappa Honor Soc'y v. Honorsociety.Org.

Mar 29, 2024 — In this suit, **PTK** alleges that Honor Society is infringing upon **PTK's** trademarks and trade dress. **PTK** says it has received more than 100 individual...

 Reddit · r/CUNY

1 comment · 2 months ago :

Phi Theta Kappa : r/CUNY

Good if you plan to transfer to a 4 year college that is affiliated with **PTK** because you can good scholarship if you meet criterias.

Missing: false | Show results with: false

Gooooooooogle >

1 2 3 4 5 6 7 8 9 10 Next

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EXHIBIT C-17

Document title: Phi Theta Kappa Lawsuit | Honor Society - Official Honor Society® Website

Capture URL: <https://www.honsociety.org/phi-theta-kappa-lawsuit>

Page loaded at (UTC): Sat, 07 Dec 2024 20:30:58 GMT

Capture timestamp (UTC): Sat, 07 Dec 2024 20:31:44 GMT

Capture tool: 10.54.0

Collection server IP: 54.145.42.72

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Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 5

Capture ID: 5DyLkFtV9nYCoU6QZrjoi3

Display Name: RSmoot



Phi Theta Kappa Lawsuit

False Advertising & Attempted Monopoly - The Phi Theta Kappa Lawsuit Details

Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Phi Theta Kappa (PTK) is currently embroiled in a lawsuit that raises serious questions about its integrity and practices. Allegations of deceptive advertising, misleading scholarship claims, and anticompetitive behavior have come to light, challenging the very foundation of PTK's esteemed reputation. As details unfold, it's crucial for students, educators, and the broader community to understand the implications of these allegations and make informed decisions about their involvement with PTK. For a deeper dive into PTK's scholarship claims, visit our detailed page on [Phi Theta Kappa Scholarships: What You Need to Know Before You Join](#). Additionally, our support page provides comprehensive coverage of the [Phi Theta Kappa Lawsuit](#), and for those questioning the value of membership, see our analysis on [Is PTK Worth It?](#). To understand more about PTK, refer to our [Phi Theta Kappa Honor Society Summary](#).

Stay informed and vigilant as we continue to provide updates on this significant case affecting the academic community.

Read the federal lawsuit complaint against Phi Theta Kappa:

[Phi Theta Kappa Sued by HonorSociety.org Lawsuit Details 2024 False Advertising](#)



Case 3:22-cv-00208-CWR-RPM Document 138 Filed 04/10/24 Page 1 of 47

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

PHI THETA KAPPA HONOR SOCIETY, Plaintiff/Counter-Defendant, v. HONORSOCIETY.ORG INC., Defendant/Counter-Plaintiff HONOR SOCIETY FOUNDATION, INC., Defendant. HONORSOCIETY.ORG INC., Defendant/Counter-Plaintiff/Third- Party Plaintiff v. LYNN TINCER-LADNER, Third-Party Defendant.	Civil Action No. 3:22-cv-00208-CWR-RPM
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HONORSOCIETY.ORG, INC.'S SECOND-AMENDED COUNTERCLAIMS AND
SECOND-AMENDED THIRD-PARTY COMPLAINT

Hi. Need any help?





LYNN TINCHER-LADNER,
Third-Party Defendant.

HONORSOCIETY.ORG, INC.'S SECOND-AMENDED COUNTERCLAIMS AND
SECOND-AMENDED THIRD-PARTY COMPLAINT

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1 of 47



FOR IMMEDIATE RELEASE - News

Alert: Honor Society® Sues Phi Theta Kappa Over Deceptive Practices and Attempted Monopoly

Las Vegas, NV, May 9, 2024: In resolute defense of students, parents and the educational community, Honor Society® has filed claims in a federal lawsuit against Phi Theta Kappa (PTK) and its CEO, Lynn Tincher-Ladner, accusing them of misleading students and attempting to monopolize the community college honor society market. Filed in the Southern District of Mississippi, the suit alleges that PTK's practices deceive students, educational institutions, and employers.

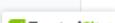
The lawsuit details several troubling practices allegedly masterminded by CEO Lynn Tincher-Ladner, including:

1. **False "Top 10%" Claims:** PTK is accused of falsely claiming in solicitations that invited students are in the "Top 10%" of their class to entice them to pay membership fees. PTK's criteria allow a much higher percentage of students to qualify. For example, at Oakton Community College, 44% of students meet PTK's 3.5+ GPA standard—significantly more than the actual "Top 10%." This misleads both those within and beyond this percentile about the exclusivity and prestige of PTK membership.
2. **Alleged Fraudulent Letters of Recommendation:** Compounding the member invitation issue, Phi Theta Kappa issues letters of recommendation on behalf of its members, with CEO Lynn Tincher-Ladner's signature, claiming that the PTK member is in the top 10% at their school—without any basis. This deceives students, colleges, and employers about the true academic achievements of PTK members.
3. **Misleading Scholarship Claims:** PTK allegedly promotes exclusive access to \$246 million in scholarships, which are actually broadly available university transfer scholarships. This misrepresentation leads students to pay for PTK membership under false pretenses. Furthermore, Phi Theta Kappa allegedly advertises that its "average member gets \$2,500 a year" in transfer scholarships, which is false. These alleged misrepresentations deceive students as to the benefits PTK provided.

These and other deceptive tactics, the lawsuit alleges, have allowed PTK to misappropriate significant sums from students, by exploiting their trust and aspirations. Moreover, the lawsuit alleges that PTK has sold and shared member data under false pretenses, further compromising student privacy and trust.



Hi. Need any help?





These and other deceptive tactics, the lawsuit alleges, have allowed PTK to misappropriate significant sums from students, by exploiting their trust and aspirations. Moreover, the lawsuit alleges that PTK has sold and shared member data under false pretenses, further compromising student privacy and trust.

PTK has also allegedly engaged in anticompetitive conduct intended to exclude competition from the community college market, harming students as a result. Mikal Calvert, marketing director of Honor Society®, states, "Phi Theta Kappa's actions have unfairly restricted the choices for honor society memberships in community colleges, misleading countless students. This lawsuit aims to dismantle these falsehoods and advocate for a market that truly values inclusivity and excellence."

Honor Society® urges those affected by PTK's deceptive practices to come forward. "We must protect vulnerable students and educational institutions from these alleged predatory behaviors," emphasizes Calvert. "We encourage anyone who believes they have been misled by Phi Theta Kappa to contact their state attorney general's office or the [Better Business Bureau](#)."

For more information about the lawsuit, visit www.ptklawsuit.com. To post or follow the topic on social media, use [#PTKlawsuit](#).

Call for Action:

If you have insights or information about PTK's alleged deceptive practices, please email PTKLawsuit@gmail.com. Your privacy and confidentiality will be respected.

About Honor Society®:

Honor Society® is a forward-thinking, technology-driven society dedicated to recognizing academic and professional excellence. For over a decade, Honor Society® has been at the forefront of promoting inclusivity and dismantling systemic bias and structural racism, providing a platform that encourages achievement at all levels. Committed to empowering its members, Honor Society® has reached millions of students and professionals across the nation, promoting inclusive excellence through personalized recognition, diverse programming, and wide-ranging career resources. As a pioneering leader in the honor society community, Honor Society® addresses critical issues often incumbent in historical honor societies, such as accessibility, equity, and inclusivity. It is a proud member of the National Association of Diversity Officers in Higher Education (NADOHE), reinforcing its role as "The Honor Society for All™." For more information about the society, visit HonorSociety.org.

###

More Links:

[Lynn Tincher-Ladner Lawsuit](#)

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EXHIBIT C-18

Document title: Unmasking Lynn Tincher-Ladner: The Allegations of False Advertising at PTK | Honor Society - Official Honor Society® Website

Capture URL: <https://www.honsorsociety.org/articles/unmasking-lynn-tincher-ladner-allegations-false-advertising-ptk>

Page loaded at (UTC): Sat, 07 Dec 2024 20:32:35 GMT

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Unmasking Lynn Tincher-Ladner: The Allegations of False Advertising at PTK

Jun 16, 2024



Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Phi Theta Kappa (PTK), long purported to be "the world's largest honor society for community college students", is facing [significant scrutiny](#) under the leadership of [CEO Lynn Tincher-Ladner](#). Recent allegations have surfaced, accusing PTK of false advertising and deceptive practices. This article aims to provide a detailed analysis of these allegations, shedding light on how [Lynn Tincher-Ladner's decisions](#) have impacted PTK's reputation and the well-being of its members.

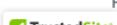
The Allegations False Claims of Exclusivity

One of the [core allegations against PTK under Tincher-Ladner's leadership](#) is the false claim of exclusivity. PTK often advertises that its members are in the "Top 10%" of their class, a prestigious accolade that suggests a high level of academic achievement. However, investigations have revealed that the criteria for membership often include a much larger percentage of students. At some institutions, up to 44% of students meet PTK's GPA standards. This significant discrepancy misleads students about the true value and exclusivity of their membership.

For more details on this, you can refer to the [Truth Behind PTK's Top 10% Claim](#).

Misleading Scholarship Promises

PTK's scholarship opportunities are a major draw for students, but the reality may not align with the promises made. PTK has promoted access to \$246 million in scholarships as exclusive to its members, but many of these scholarships are available to all students, not just PTK members. Additionally, PTK's claim that the "average member gets \$2,500 a



ABOUT THE AUTHOR



HonorSociety.org Member Services
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Misleading Scholarship Promises

PTK's scholarship opportunities are a major draw for students, but the reality may not align with the promises made. PTK has promoted access to \$246 million in scholarships as exclusive to its members, but many of these scholarships are available to all students, not just PTK members. Additionally, PTK's claim that the "average member gets \$2,500 a year" in scholarships has been disputed, suggesting that many students are misled about the financial benefits of joining the society.

To learn more, visit [Phi Theta Kappa Scholarships: Are They as Exclusive as Advertised?](#).

Fraudulent Letters of Recommendation

Another troubling allegation is the practice of issuing letters of recommendation that falsely claim members are in the top 10% of their class. These letters, signed by CEO Lynn Tincher-Ladner, are provided without verifying the students' actual class rank. This practice deceives educational institutions and potential employers about the student's academic standing, undermining the integrity of the recommendations PTK provides.

Impact on PTK's Public Image

The accumulation of these deceptive practices has significantly tarnished PTK's image. Once revered as a prestigious honor society, PTK's reputation is now under question. The leadership of Lynn Tincher-Ladner is at the center of this controversy, with calls for greater accountability and transparency in how PTK operates.

For a broader look at PTK's issues, you can read [Is PTK Worth It? A Critical Look at Phi Theta Kappa](#).

The Need for Awareness

Educational institutions that host PTK chapters must be aware of these allegations and consider the potential impact on their students. Supporting an organization accused of deceptive practices could have serious implications for the college's credibility and the trust placed in them by students and parents.

Conclusion

The allegations against PTK and Lynn Tincher-Ladner highlight the need for transparency and accountability in honor societies. Students and educational institutions deserve to be informed about the true nature of the organizations they are affiliated with. As these issues continue to unfold, it is crucial for PTK to address these allegations and work towards restoring its integrity and trust within the academic community.

For more information on the lawsuit against PTK, visit the [PTK Lawsuit Support Page](#) and [PTK Lawsuit Summary](#).

By staying informed and advocating for honest practices, we can help protect the interests of students and uphold the true values of academic excellence and integrity.

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EXHIBIT C-19

Document title: Phi Theta Kappa at Salem Community College, Carney's Point Campus: Alpha Pi Omega Chapter of PTK - Honor Society Foundation

Capture URL: <https://honorsocietyfoundation.org/phi-theta-kappa-salem-community-college-carneys-point-campus/>

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PHI THETA KAPPA AT SALEM COMMUNITY COLLEGE, CARNEY'S POINT CAMPUS: ALPHA PI OMEGA CHAPTER OF PTK

Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Dear Salem Community College, Carney's Point Campus Community,

We want to inform you about a lawsuit filed against Phi Theta Kappa (PTK), an honor society known across community colleges. The lawsuit raises serious concerns about false advertising and monopolistic practices.

PTK is accused of falsely claiming members are in the “Top 10%” of their class, when the actual percentage is much higher, misleading potential members.

Phi Theta Kappa has been alleged to make misleading scholarship claims. In member invitations PTK has said that members have exclusive access to \$246 million in scholarships and that the average member receives \$2,500 per year. However, significant amounts of these scholarships are not exclusive to PTK members; they are available generally to all students regardless of PTK membership. This false exclusivity towards scholarships eligibility allegedly misleads students into believing they will receive special access to general financial benefits by joining PTK.

Additionally, PTK has allegedly engaged in monopolistic practices, including aggressive tactics to dominate the honor society market and selling

Additionally, PTK has allegedly engaged in monopolistic practices, including aggressive tactics to dominate the honor society market and selling members' personal information without consent.

The lawsuit questions the leadership within PTK, including current CEO Lynn Tincher-Ladner, highlighting the need for greater accountability and transparency.

We are committed to protecting students from misleading practices. We encourage everyone to stay informed and consider these implications carefully.

For more information, please refer to these resources:

- Phi Theta Kappa Lawsuit: PTK Deceptive Practices and Attempted Monopoly
- Is Phi Theta Kappa Worth It?
- Is Phi Theta Kappa a Big Deal? No, It's Not
- Lynn Tincher-Ladner: Alleged Misleading Mastermind

The PTK CEO, Tincher-Ladner, allegedly masterminded these deceptive practices against community college students and institutions and should be held accountable. For more information about the PTK lawsuit, visit www.ptklawsuit.com. To post or follow the topic on social media, use #PTKlawsuit.

This is a public service announcement in the interest of protecting students and community colleges. This website is not affiliated with Phi Theta Kappa

Call for Action:

If you have insights or information about PTK's alleged deceptive practices, please email PTKLawsuit@gmail.com.

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EXHIBIT C-20

Document title: Phi Theta Kappa Alert: Is PTK Worth It at Jackson College, Central Campus? - Honor Society Museum

Capture URL: <https://honorsocietymuseum.org/phi-theta-kappa-jackson-college-central-campus/>

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Attention: PTK Alpha Rho Lambda Chapter at Jackson College, Central Campus

Dear Jackson College, Central Campus Community,

The Honor Society Museum is issuing an urgent news release to inform and protect our community about serious concerns regarding Phi Theta Kappa (PTK), an honor society widely known across community colleges. Recent developments have unveiled a lawsuit against PTK, highlighting alarming allegations of false advertising and monopolistic practices.

CRITICAL ALLEGATIONS AGAINST PTK

The lawsuit against PTK exposes significant issues that warrant our collective attention and action:

False Advertising Claims:

PTK is accused of misleadingly claiming that its members are in the “Top 10%” of their class, whereas the actual percentage of qualifying students is much higher. This deceptive practice misleads potential members about the exclusivity and value of their membership. Furthermore, PTK has been found to make misleading scholarship claims. They suggest that members have exclusive access to \$246 million in scholarships and that the average member receives \$2,500 per year. However, many of these scholarships are not exclusive to PTK members; they are available to all students. This false exclusivity misleads students into believing they will receive unique financial benefits by joining PTK.

Monopolistic Practices:

PTK has allegedly employed aggressive tactics to dominate the honor society market, including falsely claiming to be “the” and “only official” honor society for community colleges and selling members’ personal information without consent.

LEADERSHIP ACCOUNTABILITY

The current CEO, Lynn Tincher-Ladner, is at the center of these allegations. The lawsuit highlights the urgent need for greater accountability and transparency within PTK. Her leadership has come into question, and it is imperative that we hold those in power responsible for their actions.

A CALL FOR UNITY AND ACTION

We urge our community to come together to combat these deceptive practices and protect our students. This is not just about one honor society; it is about standing up against misleading practices that harm our academic integrity. Together, we can create a safer and more transparent environment for our students.

HOW YOU CAN HELP

1. **Stay Informed:** Educate yourself about the allegations against PTK and understand their potential impact on our students.
2. **Raise Awareness:** Share this information with others and encourage them to stay informed about the issues surrounding PTK.
3. **Demand Accountability:** Advocate for greater transparency and accountability from PTK’s leadership.

For more detailed information and to join the movement for transparency and justice, please refer to these resources:

- PTK Lawsuit Articles
- Phi Theta Kappa Lawsuit
- Lynn Tincher-Ladner's PTK Compensation Salary Review

For more detailed information and to join the movement for transparency and justice, please refer to these resources:

- PTK Lawsuit Articles
- Phi Theta Kappa Lawsuit
- Lynn Tincher-Ladner's PTK Compensation Salary Review

Together, we can ensure that our students receive the honest and transparent support they deserve. If you have any questions or concerns, please reach out to ptklawsuit@gmail.com.

Let us stand united in this fight for justice and integrity.

Sincerely,

Honor Society Museum

Public Service Announcement: Protecting Students and Community Colleges

This announcement aims to safeguard students and community colleges from deceptive practices. Please note, this website is not affiliated with Phi Theta Kappa.

Allegations indicate that PTK CEO Lynn Tincher-Ladner orchestrated these deceptive practices against community college students and institutions. Accountability is essential. For comprehensive information on the PTK lawsuit, visit PTK Lawsuit.

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EXHIBIT C-21

Document title: Lynn Tincher-Ladner & Phi Theta Kappa Are Sued for False Advertising: What You Need to Know - College Budget

Capture URL: <https://collegebudget.com/2024/05/21/lynn-tincher-ladner-phi-theta-kappa-are-sued-for-false-advertising-what-you-need-to-know/>

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Lynn Tincher-Ladner & Phi Theta Kappa Are Sued for False Advertising: What You Need to Know

By collegebudget · May 21, 2024 · lawsuit, phi theta kappa, PTK



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False Advertising & Attempted Monopolization Highlight the Alleged Claims Against Tincher-Ladner.

In a significant development to protect community college students, Honor Society has filed a federal lawsuit

False Advertising & Attempted Monopolization Highlight the Alleged Claims Against Tincher-Ladner.

In a significant development to protect community college students, Honor Society has filed a federal lawsuit against Lynn Tincher-Ladner, CEO of Phi Theta Kappa (PTK). The lawsuit, initiated in the Southern District of Mississippi, brings forward serious allegations of deceptive practices and monopolistic behavior under Tincher-Ladner's leadership. For students, parents, and educators, these claims warrant close attention.

Key Allegations Against Lynn Tincher-Ladner

False "Top 10%" Claims: Under Tincher-Ladner's leadership, PTK is accused of misleading students by falsely claiming they are in the top 10% of their class to entice them to pay membership fees. At some colleges, a much higher percentage of students qualify, raising concerns about the accuracy and ethics of these claims.

Questionable Letters of Recommendation: The lawsuit alleges that PTK, under Tincher-Ladner's direction, issues letters of recommendation stating that members are in the top 10% of their class, often without any factual basis. This could potentially mislead students, colleges, and employers about the actual merit of PTK membership.

Misleading Scholarship Information: PTK promotes access to \$246 million in scholarships as an exclusive benefit of membership. However, these scholarships are generally available to all students. Additionally, PTK claims that the "average member gets \$2,500 a year" in transfer scholarships, which the lawsuit argues is misleading and deceptive.

Privacy Concerns

The lawsuit also addresses issues of privacy, accusing PTK under Tincher-Ladner's leadership of selling and sharing member data under false pretenses. This raises significant ethical questions about how PTK manages personal information and the integrity of its practices.

Anticompetitive Conduct

Tincher-Ladner is further accused of engaging in monopolistic behavior to dominate the community college honor society market. This includes allegedly deceptive marketing tactics and claims intended to stifle competition and limit student options, all orchestrated to maintain PTK's market dominance.

Impact on Students

For current and prospective members of PTK, these allegations are crucial. Understanding the true value and ethics of the organizations you join is essential. The lawsuit highlights the importance of transparency and honesty in honor societies, which should recognize academic excellence without misleading students or exploiting their aspirations.

Call to Action

If students feel they have been misled by PTK or have encountered any related issues, it is important to speak out. Honor Society encourages affected individuals to share their experiences and seek justice. Students can contact their state attorney general's office or the Better Business Bureau if they believe they have been misled by PTK.

For more details about the lawsuit and to join the conversation, visit www.ptklawsuit.com and use the hashtag #PTKlawsuit on social media.

Commentary from College Budget

At College Budget, we believe this lawsuit is more than just a legal battle; it serves as a crucial reminder of the



Commentary from College Budget

At College Budget, we believe this lawsuit is more than just a legal battle; it serves as a crucial reminder of the need for accountability and integrity in academic honor societies. The allegations against Lynn Tincher-Ladner and PTK underscore the importance of transparent and honest practices within such organizations. As this case unfolds, we will continue to monitor developments and provide updates to ensure that students and their families are informed and protected.

Have thoughts on this issue? Share your comments below and let us know how you feel about these allegations against Lynn Tincher-Ladner and PTK.

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May 21, 2024
In "PTK Lawsuit"

[Is Theta Alpha Kappa Worth it? Dues, Costs, Requirements & More](#)
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CATEGORIES

Disclaimer: The author of this article is not a neutral party in the referenced litigation. HonorSociety.org Inc., Honor Society Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Foundation Inc., and its president Michael Moradian were sued in federal court by PTK on April 20, 2022 for False Designation of Origin, Trade Dress Infringement, and Unfair Competition. Honor Society and Michael Moradian countersued and are presently defendants/counter-plaintiffs in this litigation. Litigation is still ongoing and all claims made regarding this case are just allegations against the parties.

Important Update for Students at the Carrington College, San Leandro Campus: Be Aware!

Dear Carrington College, San Leandro Campus Community,

We are reaching out to alert you to some serious concerns involving Phi Theta Kappa (PTK), an honor society across many community colleges. A lawsuit has been filed against PTK, unveiling disturbing allegations of false advertising and monopolistic practices that demand our attention.

KEY ALLEGATIONS AGAINST PTK

PTK stands accused of falsely advertising that its members are in the "Top 10%" of their class. Investigations have revealed that the actual percentage of students who qualify is significantly higher, misleading students about the exclusivity and prestige of their membership. PTK has also been alleged to make misleading scholarship claims. They suggest that members have exclusive access to \$246 million in scholarships and that the average member receives \$2,500 per year. However, many of these scholarships are not exclusive to PTK members; they are available to all students. This false exclusivity misleads students into believing they will receive unique financial benefits by joining PTK.

Moreover, PTK has allegedly engaged in monopolistic practices, including aggressive tactics to dominate the honor society market and the unauthorized sale of members' personal information. The leadership of PTK, particularly CEO Lynn Tincher-Ladner, has come under scrutiny, raising urgent questions about accountability and transparency within the organization.

CALL TO ACTION: PROTECT OUR STUDENTS

We urge you to stay informed and take action to protect our community from these deceptive practices. It is crucial that we work together to ensure transparency and integrity in all educational organizations.

Steps You Can Take:

- Educate Yourself:** Familiarize yourself with the details of the lawsuit against PTK and understand the potential impact on our students.
- Spread the Word:** Inform your peers about the issues associated with PTK and encourage them to stay vigilant.
- Advocate for Change:** Demand greater transparency and accountability from PTK's leadership, including Lynn Tincher-Ladner.

For further information and to support efforts for justice and transparency, please visit the following resources:

- PTK Lawsuit Articles
- PTK Lawsuit: Deceptive Practices and Attempted Monopoly
- Lynn Tincher-Ladner's PTK Compensation Salary Review



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- 18th Century
- 19th Century
- 20th Century
- 21st Century
- Alpha Omega Alpha
- Blog
- Collections
- Dartmouth
- Harvard
- High School
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- Honor Society
- Honor Society Foundation Books
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- Iowa State
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- Member Trips
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- PTK Lawsuit Articles
- PTK Lawsuit: Deceptive Practices and Attempted Monopoly
- Lynn Tincher-Ladner's PTK Compensation Salary Review

By standing together, we can protect our students from misleading practices and ensure that they receive the honest support they deserve. If you have any questions or concerns, please contact PTKlawsuit@gmail.com.

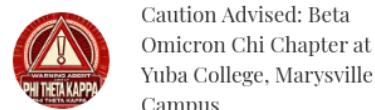
Let's unite for transparency and justice.

 Phi Theta Kappa
Caution Advised: Beta Delta Psi Chapter at Des Moines Area Community College, Urban Campus

JUNE 22, 2024

Sincerely,

Honor Society Museum



JUNE 22, 2024

Public Service Announcement: Protect Students and Community Colleges

This announcement aims to safeguard students and community colleges from deceptive practices. Please note, this website is not affiliated with PTK Beta Phi Alpha Chapter Chapter nor Phi Theta Kappa.

Allegations indicate that PTK CEO Lynn Tincher-Ladner orchestrated these deceptive practices against community college students and institutions. Accountability is essential. For comprehensive information on the PTK lawsuit, visit [PTK Lawsuit](#).

Honor Society Museum

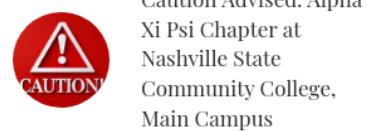
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